

# Exhibit 4

**Our ref: PT/CH/000338-0001**

**Your ref: DBM/AKS/NEWS3.689**

**13 November 2020**

Grosvenor Law  
27 Grosvenor Street  
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**BY EMAIL:**

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Dear Sirs,

**Our Clients: Ghanem Nuseibeh & Cornerstone Global Associates**

**Your Clients: Diligence**

We refer to your letter dated 3<sup>rd</sup> November 2020.

A number of points arise.

First, you state that you act for “Diligence”. However, in your Heading you specifically name your client as “Diligence Global Business Intelligence SA”. Please confirm that you also represent Diligence International LLC and its constituent “Diligence” companies, and that your response applies equally to each of these companies.

Second, we refer to the enclosed letter dated 7<sup>th</sup> October 2020 in which it was stated on behalf of Diligence, apparently by its inhouse Counsel, that “neither Diligence International LLC nor its parent company Diligence Inc” have been involved in any investigation into your clients”. This statement would appear to be false or misleading as a London branch of Diligence has clearly been involved in such investigations. Please provide a full explanation as how such a false or misleading statement could have been made in response to a formal solicitors’ letter.

Third, you state that Diligence have been conducting covert surveillance of our clients on behalf of an unnamed client in investigating unparticularised “allegations of bribery, corruption and related money laundering relevant to the Qatar World Cup 2022”, allegations of payments to an unnamed Member of Parliament and bribes to an unnamed contractor. You seek to justify these activities by reference to an article published in the *New York Times* almost two years ago which makes no reference to any such bribery, corruption or money laundering and no reference to payments to any MP. We can only infer that there is, in fact, no proper justification for your client’s surveillance activities. If you disagree please provide details of the purported wrongdoing by our clients that Diligence was investigating.

Fourth, you seek to justify Diligence’s activities by reference to a “request for further information by the NCA”. Once again, no details are provided as to when and in what terms this request was made. The suggestion that an official body such as the NCA would ask a private investigator to

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carry out surveillance of a British citizen is obviously implausible. If Diligence continues to rely on such a request please provide details of when, by whom and in what terms such a request was made.

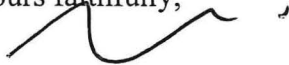
It is obviously a matter of grave concern to our clients that an unnamed client has instructed Diligence to conduct surveillance, including by the placing of a recording device outside our clients' office. Please now provide full details of the clients who gave such instructions to Diligence. In the absence of full information in this regard we anticipate receiving instructions to apply for a *Norwich Pharmacal* order to require Diligence to provide this information.

As to the matters raised in the last paragraph of your letter, these have been dealt with in the letter of 11 November 2020 from Richard Healey of this firm and we do not propose to address them further.

Do you have instructions to accept service of proceedings on behalf of Diligence International LLC and its constituent companies, including Diligence Global Business Intelligence SA?

Please acknowledge receipt of this letter by return and provide a full response within 7 days.

Yours faithfully,



**Gateley Tweed**

Please reply by email to: [paul.tweed@gateleytweed.com](mailto:paul.tweed@gateleytweed.com)

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